

# **Reply Exhibit A**

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

DWIGHT McDONALD, CHRISTOPHER	)	
ATKINS and TIMOTHY PROVOST,	)	
Each Individually and on Behalf	)	
of All Others Similarly Situated,	)	
	)	
Plaintiffs	)	No. 21-cv-6260
	)	
vs.	)	
	)	
M2 MANAGEMENT INC.,	)	
and MICHAEL P. TRAINOR,	)	
	)	
Defendants	)	

**SUPPLEMENTAL DECLARATION OF MICHAEL P. TRAINOR**

I, Michael P. Trainor, declare as follows:

1. I make the statements in this Declaration based on my personal knowledge and based on records maintained in the ordinary course of business. If called upon to do so, I could and would testify competently about these statements.

2. I have reviewed Plaintiffs' Response in Opposition to Defendants' Rule 60(b)(4) Motion to Vacate and provide this Supplemental Affidavit to address factual inconsistencies raised in Plaintiffs' Response.

3. Prior to May 2022, I, Michael Trainor, purchased the property located at 53 Diamond Ledge Rd., Thornton, NH 03285 for use as the principal office of M2 Management, Inc.

4. After I purchased the property, I brought in an office container and installed a mail box on the property.

5. The property also included signage advertising for M2 and contained M2's phone number and an invitation to call to make an appointment.

6. Once the temporary office and mailbox were set up, I actively used the Thornton address for M2's business activities.

7. The mailbox at the Thornton address was regularly monitored by me and used to receive both personal and business-related mail.

8. M2 Management's operations were run from the Thornton property prior to May 2022.

9. I regularly checked the mail at the Thornton address and would have received any legal correspondence sent to the Thornton address by mail in or around May 2022.

10. I never received any legal correspondence, summons, or certified mail from the Plaintiffs or anyone representing them at the Thornton address.

11. I also maintain an email address at [mike@m2management.org](mailto:mike@m2management.org).

12. I have reviewed the emails attached as Exhibit 4 to Plaintiffs' Response.

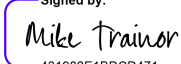
13. In Exhibit 4, Matthew Foster, represents that he emailed me on or about January 26, 2022.

14. I have reviewed my emails and did not receive any email correspondence from Matthew Foster.

15. I have never received an email regarding this case from any person or party representing the Plaintiffs named in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 9, 2025, New Hampshire.

Signed by:  
  
431982E1BDCD471...

Michael P. Trainor